

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

IN RE:)
WILLIAM CHARLES BEVAN)
Debtor) Case No. 22-12609
) (Chapter 13)
)

**MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR AND AS COUNSEL TO
AGENT IN FACT IN IMPLEMENTATION OF CONFIRMED CHAPTER 13 PLAN
OF REHABILITATION AND REQUEST FOR WAIVER OF SEVEN (7) DAY
NOTICE OTHERWISE REQUIRED BY LOCAL RULE 9010-4**

THE BURNS LAWFIRM, LLC (the "Firm"), by and through undersigned
counsel to the Debtor, as counsel to the Agent in Fact, also referred to by the undersigned as
the special purpose entity, Adam Ross Levin in implementation of confirmed Chapter 13 Plan
of Rehabilitation, hereby moves to withdraw and strike his appearance because of the finding
and conclusion of the Bankruptcy Court as of May 16, 2023, that there exists a conflict of
interest which was caused by the deviation of the Debtor, William Charles Bevan, from the
irrevocable and binding terms of his confirmed Chapter 13 Plan as set forth on the record, and
the above referenced Firm must therefore withdraw its appearance, and the Firm seeks a
waiver of the seven (7) day notice otherwise required by Local Rule 9010-4, and states as
follows:

The Firm should be permitted to withdraw from the above captioned Chapter 13 case as counsel of record to the Debtor and in aid of implementation of the confirmed Chapter 13 Plan of Rehabilitation to the agent in fact or SPE Adam Ross Levin solely in his role as agent in fact. The withdrawal should be effective immediately given the statements made by Debtor contrary to his confirmed Plan in open court on May 16, 2023 and the Bankruptcy Court's finding and conclusion on May 16, 2023 that a conflict now exists given

those statements and positions taken by the Debtor. The Firm consents to the jurisdiction of the Bankruptcy Court in entering final Orders in this Chapter 13 case. No memorandum shall be filed to accompany this Motion pursuant to Local Rule 9013-2. A fee application shall be filed to the date of the Order releasing appearance and granting this Motion.

WHEREFORE, Firm respectfully requests that the Bankruptcy Court enter an Order: (i) Granting the Motion; (ii) Striking the appearance of the Firm as counsel in this Chapter 13 case and authorizing immediate withdrawal of the Firm herein with waiver of Local Rule 9010-4 notice; and (iii) Granting such other and further relief as equity and justice may require.

Respectfully Submitted,
-----/s/ John D. Burns-----
John D. Burns, Esq. #22777
The Burns Law Firm, LLC
6305 Ivy Lane, Suite 340
Greenbelt, MD 20770
(301) 441-8780
*Counsel for the Debtor and as to the Agent In Fact and
SPE in implementation of the Plan*
INFO@BURNSBANKRUPTCYFIRM.COM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 16, 2023, a copy of the Motion with Order was served upon the following as specified via ECF, EMAIL or via first-class mail postage prepaid to those parties listed on the attached creditor matrix and the following additional parties:

By ECF Notification Upon:

Timothy Branigan, Chapter 13
Trustee 9891 Broken Land
Parkway, Suite 301
Columbia, MD 21046
Chapter 13 Trustee

dpesacho@siwpc.com

Dan Pesachowitz, Counsel for U.S. Bank / Fay Servicing

Leah Freedman Leah.Freedman@bww-law.com

Counsel for U.S. Bank / Fay Servicing

Parties registered for ECF notification

BY ELECTRONIC MAIL:

Jeanette Rice, Esquire
Office of the United States Trustee
6305 Ivy Lane; STE 340
Greenbelt, MD 20770

Adam Ross Levin
Homewise Realty Services, LLC
11140 Rockville Pike
Suite 420
Rockville, MD 20852

Steinwedel, William wsteinwedel@mdlab.org
Legal Aid – Medical Placement Issues Counsel
For Debtor

williamrudow@rudowlaw.com

William Rudow, Esquire

ugotmold@yahoo.com

Ivelin Kostadinov, Contractor

William C. Bevan, Debtor

drwilliambevan@juno.com

BY First Class Mail Postage Prepaid Upon:

Dr. William Bevan
ProMedica Skilled Nursing and Rehab (Manor Care)
11901 Georgia Avenue
Wheaton, MD 20902

-----/s/ John D. Burns-----

John D. Burns, Esq. #22777
The Burns Law Firm, LLC
6305 Ivy Lane, Suite 340
Greenbelt, MD 20770
(301) 441-8780
*Counsel for the Debtor and as to the Agent In Fact and
SPE in implementation of the Plan*
INFO@BURNSBANKRUPTCYFIRM.COM